

From: [Greg Loarie](#)
To: [Kate Bouve/DC/USEPA/US@EPA](mailto:Kate.Bouve/DC/USEPA/US@EPA)
Subject: RE: Telephone conversation
Date: 01/14/2013 12:16 PM
Attachments: [2005 memo Shelgren to Cortez.pdf](#)
[CDFG 1999 TableCAWildlifeSubmittedForAnalysis1994-1999.pdf](#)
[CDFG 2000 TableCAWildlifeSubmittedForAnalysis1994-2000--PRA.PDF](#)
[CDFG 2003 TableCAWildlifeSubmittedForAnalysis1994-2003.pdf](#)
[Lima, L. L., and T. P. Salmon, 2012.pdf](#)
[Riley, S..pdf](#)
[WildCare-PRA.PDF](#)
[CDFG 2012a ExcelDatabase.pdf](#)
[CDFG 2012b ExcelDatabase.pdf](#)
[draft data analysis memo 9-19-12.pdf](#)

Hello again,

I received late Friday CDPR's response to my request for (1) the "2005 memo," later withdrawn, in which CDPR recommended restricting SGARs to indoor use, (2) the poisoning incident data currently under review by CDPR, and (3) the draft "data analysis memo" currently out for peer review by UC scientists. All these docs are attached FYI. The conclusion of the data analysis memo is notable:

Based on the data above, DPR finds that use of two of the four second generation anticoagulant rodenticides--brodifacoum and bromadiolone-- present a hazard related to persistent residues in target animals resulting in impacts to non-target wildlife. Because they are similar in half-life and toxicity, DPR also find that if the use of difethialone and difenacoum were to increase, rodenticides containing those two second generation anticoagulant rodenticides may also present a hazard related to persistent residues in target animals.

Best,

Greg

From: Greg Loarie
Sent: Wednesday, January 09, 2013 1:31 PM
To: Bouve.Kate@epamail.epa.gov
Subject: RE: Telephone conversation

Hello Kate,

It was good to speak with you today. Pasted below is Susan's contact information. I'm also attaching CDFG's most recent letter to CDPR re: second-generation anticoagulants.

Susan E. Kegley, Ph.D., Principal and CEO Pesticide Research Institute
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I will let you know when I receive from CDPR (1) the issue paper they issued in 2005 proposing restrictions on second-gen anticoagulants, and (2) the analysis paper currently under review by UC scientists.

Best regards,

Greg

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From: Bouve.Kate@epamail.epa.gov [mailto:Bouve.Kate@epamail.epa.gov]
Sent: Wednesday, January 09, 2013 12:30 PM
To: Greg Loarie
Subject: Telephone conversation

Greg -

Thanks again for your time this afternoon. I would appreciate receiving contact information for Susan Kegley (sp?), the 2011 Department of Fish and Game letter to DPR, and the DPR report on second generation anticoagulant rodenticides (once you've received it).

I'll also find out if it is EPA practice to allow a third party to be an intervenor in an administrative hearing.

Best wishes

Kate Bouvé
Office of Pesticide Programs
U.S. EPA
703-305-5032